

KAPLAN

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OSRECOVERY, INC. et al.,

Plaintiffs,

vs.

ONE GROUPE INTERNATIONAL, INC., et al.,

Defendants.

02 Civ. 8993 (LAK)

STIPULATION

The undersigned counsel for hereby stipulate and agree that the documents listed on Exhibit A hereto shall be added to and made a part of the record in this case and that such documents are to be held by the attorneys of record until requested by the Court.

Dated: New York, New York
March 16, 2006

SULLIVAN & WORCESTER LLP

By: 

Richard B. Verner (RV-7411)
1291 Avenue of the Americas
New York, NY 10104
(212) 660-3000

Attorneys for Appellant Gray Clare.

Dated: New York, New York
March 17, 2006

BAKER & McKENZIE

By: 

Lawrence W. Newman (LN 7881)
1114 Avenue of the Americas
New York, NY 10036
(212) 626-4100

*Attorneys for Defendant-Appellee Latvian
Economic Commercial Bank*

SO ORDERED.

Dated: March 20, 2006

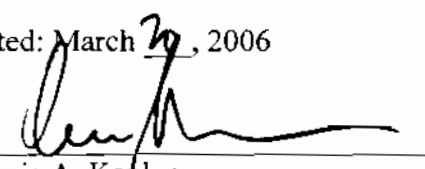

Lewis A. Kaplan
United States District Judge

Exhibit A

<u>Date</u>	<u>Document</u>
02/05/04	Transcript of hearing before the Hon. Lewis A. Kaplan on February 5, 2004
05/28/04	Letter application from plaintiffs' counsel to the court seeking a protective order for Gray Clare
06/01/04	Order compelling plaintiffs' to respond to Parex's discovery requests over relevance objections
06/03/04	Letter from Lawrence Newman to Judge Kaplan in Response to Motion for Protective Order with Exhibits A-N
09/17/04	Letter from Lawrence Newman to Judge Kaplan Relating to Gray Clare's Discovery with Exhibits A-H
09/21/04	Letter from plaintiffs' counsel to the Court responding to Lateko's September 17, 2004 letter
09/22/04	Letter from Lateko to the Court responding to plaintiffs' September 21, 2004 letter
09/22/04	Letter from plaintiffs' counsel to the Court in response to Lateko's letter of the same date
09/22/04	Letter from Parex's counsel to the Court re Lateko's September 17, 2004 letter and plaintiffs' subsequent letters
09/23/04	Letter to the Court from plaintiff's counsel concerning, among other issues, Gray Clare
09/23/04	Letter from Lateko to the Court re Gray Clare (with exhibits)
12/02/04	Proposed Order submitted by Lateko Bank along with Motion to compel
02/25/05	Letter from Lateko to the Court concerning discovery deficiencies, including those of Gray Clare (with exhibits)
04/07/05	Notice of Motion to hold Gray Clare and OSRecovery, Inc. in contempt
04/07/05	Memorandum of Law in support of Motion to hold Gray Clare and OSRecovery, Inc. in contempt
04/07/05	Declaration of James M. Torre in support of Motion to hold Gray Clare and OSRecovery, Inc. in contempt (with exhibits)
04/14/05	Opposition by OSRecovery, Inc. and Gray Clare to motion to hold them in contempt
04/18/05	Lateko's Reply memorandum in support of its motion for an order of contempt and other sanctions against Gray Clare and OSRecovery, Inc.

04/18/05 Declaration of Scott Hutchins in support of Lateko's Reply memorandum in support of its motion for an order of contempt and other sanctions against Gray Clare and OSRecovery, Inc. (with exhibits)

04/18/05 Submission of Unreported Cases filed in support of Lateko's Reply memorandum in support of its motion for an order of contempt and other sanctions against Gray Clare and OSRecovery, Inc.

04/26/05 Letter from Lateko to the Court accepting its invitation to take discovery concerning whether Clare is the alter ego of OSRecovery, Inc. (with exhibits)

04/27/05 Letter from Sullivan & Worcester to the Court indicating that they may be retained by Clare concerning the contempt issue

05/02/05 Letter to the Court by Gray Clare, through Mayer Brown, concerning Lateko's letter and alter ego discovery

05/03/05 Letter from Sullivan & Worcester to the Court indicating that they have been retained by Clare re contempt issue

05/03/05 Letter to the Court from Lateko Bank in response to the May 2, 2005 letter from Mayer Brown to the Court concerning alter ego discovery

06/07/05 Letter from Lateko to the Court responding to Sullivan & Worcester's June 1, 2005 letter

06/10/05 Letter from Sullivan & Worcester to the court seeking to file additional papers on behalf of Gray Clare

07/07/05 Further Submission of Lateko Bank in Support of its motion for contempt and other sanctions against Gray Clare and OSRecovery, Inc.

07/07/05 Declaration of Scott Hutchins in support of Further Submission of Lateko Bank in Support of its motion for contempt and other sanctions against Gray Clare and OSRecovery, Inc. (with exhibits)

07/07/05 Letter to Judge Kaplan from Frank Velle in Further Opposition Lateko's Motion for Sanctions

07/07/05 Declaration of Brett Taylor with Exhibits 1-13

07/07/05 Declaration of Gray Clare with Exhibits 1-10

06/12/05 Letter to Judge Kaplan from Lawrence Newman responding to Clare (sic) submission dated 7/7/05

07/13/05 Letter from Sullivan & Worcester to the Court responding to Lateko's letter of July 12, 2005

7/13/05 Endorsed Letter to Judge Kaplan from Lawrence Newman responding to Clare submission dated 7/7/05.

07/19/05 Notice of Renewed Motion by Latvian Economic Commercial Bank for Sanctions Pursuant to Fed. R. Civ. P. 37 Against the Doe Plaintiffs and Osrecovery, Inc. Who have Served Insufficient Responses to its Discovery Requests

07/19/05 Memorandum of Law in Support of the Renewed Motion by Latvian Economic Commercial Bank for Sanctions Pursuant to Fed. R. Civ. P. 37 Against the Doe Plaintiffs and Osrecovery, Inc. Who have Served Insufficient Responses to its Discovery Requests with Exhibits A-D

07/22/05 Opposition filed by Mayer Brown firm in response to further submission by Lateko in support of its application for contempt and other sanctions against Clare and OSRecovery, Inc.

07/22/05 Declaration of Mitchell Wong in support of opposition filed by Mayer Brown firm in response to further submission by Lateko in support of its application for contempt and other sanctions against Clare and OSRecovery, Inc.

07/26/05 Reply Memorandum in Support of the Renewed Motion

07/26/05 Declaration of Scott C. Hutchins in Support of the Renewed Motion with Exhibits A-D

08/12/05 Letter from Sullivan & Worcester to the Court seeking a stay of August 4, 2005 order

08/15/05 Letter from Lateko to the Court in response to Sullivan & Worcester's August 12, 2005 request for a stay